PLEA PACKET MEMO

United States District Court
Southern District of Texas
FILED

NOV 29 2016

David J. Bradley, Clerk of Court

ASSIGNED AUSA: **JASON CORLEY**

DEFENDANT: **HOWARD WILLIAM HALVERSON**

CASE# **B-16-652**

FACT SUMMARY SHEET

On June 21, 2016, Defendant HOWARD WILLIAM HALVERSON, while present at a condominium owned by him located on South Padre Island in Cameron County and within the Southern District of Texas, knowingly possessed multiple digital images containing visual depictions of minors engaged in sexually explicit conduct.

More specifically, Defendant HALVERSON, through the use of multiple digital storage devices, including laptop computers, knowingly possessed numerous digital images containing the depictions of child pornography, that is the images were produced through the use of a minor engaging in sexually explicit conduct and that the images did in fact depict minors engaged in sexually explicit conduct.

Many of the images possessed by Defendant HALVERSON contained the depiction of prepubescent minors or children under the age of 12 engaged in sexually explicit conduct.

These images had been transported through interstate and foreign commerce by means of internet traffic through the use of peer to peer networking. Moreover, these images were stored on digital storage devices and computers that had been manufactured and shipped in interstate and foreign commerce.

Defendant HALVERSON knew the images contained on his digital storage devices depicted sexually explicit conduct involving minors.

I agree the above factual summary accurately represents my involvement in the crime to which I am pleading guilty and that the proposed plea agreement accurately and fully describes my plea agreement with the government.

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Counsel for Defendant

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Defendant

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Assistant U.S. Attorney